

EXHIBIT 3

Taft/

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November 12, 2007

VIA FAX AND REGULAR MAIL

Robert Childs
Herman Johnson
Susan Donahue
Wiggins, Childs, Quinn & Pantazis, P.C.
The Kress Building
301 19th Street North
Birmingham, Alabama 35203

Re: Bert, et al. v. AK Steel Corporation

Dear Counselors:

Enclosed please find Defendant's Amended Witness List and Summary. This list clarifies that we do not intend to call Louie Cox, Brenda Harmon and Michael Lehman, who were in our initial disclosures. In fact, it is my understanding that Mr. Cox is now deceased. I understand from Bob's conversation with Larry that based on this amendment, depositions will not be scheduled for these individuals.

Sincerely,



Patricia Anderson Pryor

PAP:sls

Enclosure

cc: Paul Tobias (w/encl.) (via fax and regular mail)
David Sanford (w/encl.) (via fax and regular mail)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.,	:	CASE NO. 1:02CV467
	:	
Plaintiffs,	:	Judge Beckwith
	:	
v.	:	DEFENDANT'S AMENDED
	:	WITNESS LIST AND
AK STEEL CORPORATION,	:	<u>SUMMARY</u>
	:	
Defendant.	:	

Pursuant to the Court's Calendar Order of February 28, 2007, Defendant AK Steel Corporation identifies the following potential witnesses in this matter. Defendant reserves the right to supplement this witness list as needed in the future, and to call any rebuttal witnesses it determines are necessary.

1. Mary Baker

Dr. Baker has knowledge and is expected to testify about matters contained in her expert reports and similar matters based on updated circumstances and information. She is also expected to testify on all matters addressed by Plaintiffs' expert, including damages and mitigation of damages.

2. Vivian Bert

Ms. Bert is expected to testify about her claims.

3. Darlene Carter

Ms. Carter is expected to testify about her claims.

4. Darrell Carter

Mr. Carter is expected to testify about his claims.

5. Marnie Carter

Ms. Carter is expected to testify about her claims.

6. Donald Edwards

Mr. Edwards is expected to testify about his claims.

7. Lucy Gibson

Ms. Gibson has knowledge and is expected to testify about the development and validation of the pre-employment test.

8. James Greenwood

Mr. Greenwood is expected to testify about his claims.

9. Kay Jackson

Ms. Jackson is expected to testify about her claims.

10. Susan Lester

Ms. Lester has knowledge and is expected to testify about AK Steel's hiring process, her interactions with Plaintiffs, the reasons Plaintiffs were not hired and AK Steel's outreach efforts to minorities.

11. Edward James Lewis

Mr. Lewis is expected to testify about his claims.

12. Michael Miller

Mr. Miller is expected to testify about his claims.

13. Jessica Morris

Ms. Morris has knowledge and is expected to testify about AK Steel's hiring process, her interactions with Plaintiffs, the reasons Plaintiffs were not hired and AK Steel's outreach efforts to minorities.

14. Richard Nunlist

Mr. Nunlist has knowledge and is expected to testify about the work Palmer Temps performed for AK Steel and Mr. Edwards' interactions with Palmer Temps.

15. Timothy Oliphant

Mr. Oliphant is expected to testify about his claims.

16. Shawn Pryor

Mr. Pryor is expected to testify about his claims.

17. Al Roberts

Mr. Roberts is expected to testify about his claims, and the circumstances leading up to this lawsuit.


18. Roderique Russell

Mr. Russell is expected to testify about his claims.

19. Phyllis Short

Ms. Short has knowledge and is expected to testify about AK Steel's hiring process, the reasons Plaintiffs were not hired and AK Steel's outreach efforts to minorities.

Respectfully submitted,



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Trial Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on November 12, 2007 via fax and regular U.S. mail to Susan Donahue, Robert Childs, Herman N. Johnson, Jr., Wiggins, Childs, Quinn & Pantazis, P.C., The Kress Building, 301 19th Street North, Birmingham, Alabama 35203; Paul H. Tobias, Tobias, Kraus & Torchia, 911 Mercantile Library Building, 414 Walnut Street, Cincinnati, Ohio 45202; and David Sanford, Sanford, Wittels & Heisler, L.L.P., 1666 Connecticut Avenue, N.W., Suite 310, Washington, D.C. 20009.

